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February 22, 2024

**Via Email**

Hon. Michael A. Hammer, U.S.M.J.  
United States District Court,  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street Room 4015  
Newark, NJ 07101

**Re: *Emerson Redevelopers Urban Renewal, LLC v. Borough of Emerson and Mayor Danielle DiPaola***  
**Docket No.: 2:20-cv-04728**

Dear Judge Hammer:

We represent Plaintiffs. We apologize on behalf of the parties for the oversight in the untimely submission of parties' joint proposed amendment to the expert discovery schedule, as discussed with Your Honor at the settlement conference on February 5, 2024. The parties have conferred regarding their respective trial schedules and respectfully request that the Court consider the parties' joint proposed amended schedule to complete the expert depositions and serve and respond to summary judgment motions.

The parties request the following schedule:

| Date    | Deadline  |
|---------|---|
| 5/15/24 | Completion of all expert depositions.                             |
| 6/14/24 | Any motion for summary judgment to be filed and served.           |
| 7/17/24 | Opposition to motion for summary judgment to be filed and served. |
| 7/31/24 | Reply on motion for summary judgment to be filed and served.      |

We thank Your Honor for your courtesies in this matter.

Respectfully submitted,

*s/Joseph B. Fiorenzo*

Joseph B. Fiorenzo

cc: All counsel of record (via CM/ECF)

